

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

<b>AMERICAN CIVIL LIBERTIES UNION,</b>	)	
et al.,	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
v.	)	Civil Action No. 98-5591
	)	
<b>ALBERTO R. GONZALES,</b> in his official	)	
capacity as Attorney General of the United	)	
States,	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT'S REPLY TO PLAINTIFF'S RESPONSE**  
**REGARDING HIS MOTION TO EXTEND THE DEADLINE**  
**FOR THE EXCHANGE OF PRINCIPAL EXPERT REPORTS**

Although defendant does not accept plaintiffs' characterization of prior scheduling matters in this case (or their other grounds for opposing his requested extension), he does not oppose their suggestion that, if the deadline for the exchange of principal expert reports is extended, the deadline for the exchange of expert rebuttal reports should also be extended. A proposed order that incorporates plaintiffs' suggestion is attached for the Court's convenience.

Dated: April 27, 2006

Respectfully submitted,

PATRICK L. MEEHAN  
United States Attorney

RICHARD BERNSTEIN  
Assistant U.S. Attorney

THEODORE HIRT  
Assistant Branch Director

/s/ Joel McElvain  
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CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2006, I caused the foregoing Defendant's Reply to Plaintiffs' Response to His Motion to Extend the Deadline for the Exchange of Principal Expert Reports, with the attached proposed order, to be filed electronically and therefore to be available for viewing and downloading from the Electronic Case Filing system. The electronic filing of these documents constituted service of these documents on the following:

Aden Fine, Esquire  
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New York, NY 10004

/s/ Joel McElvain  
JOEL McELVAIN  
*Attorney*